



State of Arizona
Department of Education
Office of Diane M. Douglas
Superintendent of Public Instruction.

Administrative Review Summary Report

Sponsor: KIRKLAND ELEMENTARY DISTRICT
CTD: 13-03-23
Site(s): Kirkland Elementary School

Contact: Michele Perey, Principal and Karry Lewis, Cafeteria Manager

Review Date: October 20, 2016

Review Period:

Programs Reviewed: ☒ National School Lunch ☒ School Breakfast ☐ Afterschool Snack
☐ Fresh Fruit & Vegetable ☐ Special Milk

Review Observations & Findings	Technical Assistance Provided	Required Corrective Action
Performance Standard 1: Certification & Benefit Issuance- Critical Area		

More than twenty students who were found to be matches within direct certification reports were instead certified as case number or income eligible via household applications. Direct certification reports including full enrollment not executed as required. SFA process was to run only Individual Look-up direct certification reports for students that did not provide a household application within the first month of school. These errors occurred for students certified for free meals by other means in addition to direct certification, so this finding did not contribute to fiscal action.

Discussed errors found and clarified that direct certification supersedes all other eligibility. Technical assistance included required corrective action, direct certification procedures, documentation to be provided on applications by SFA, procedures in updating and accurately transferring eligibility status to BID, and the eligibility manual as a resource: <http://www.azed.gov/health-nutrition/files/2016/07/2016-eligibility-manual-for-school-meals.pdf>. Refer to Processing Applications, Determining Completion of Submitted Application, Indicating Income and Income Sources, section in USDA's Eligibility Manual for School Meals.

Please provide written procedures that will be implemented to ensure that direct certification reports that include full enrollment will be performed at the start of the school year and at the intervals required, and that all students who are direct certification matches are identified, provided with free meal eligibility, represented properly with the benefit issuance document, and any existing applications are noted and filed separately. SFA has completed corrections to the eligibility status for the students misidentified as case number and income free rather than direct certification match for this review period.

One case number application was approved with a 16 digit case number. This student was also a direct certification match so this finding did not contribute to fiscal action.	Discussed that case number format must be verified; SNAP as 8 digits or less with no alpha characters. FDPIR may include letters or be a social security number.	<i>Please provide written assurance that case number applications will be reviewed for proper case number format.</i>
Some household applications were identified as denied that at face value would have been eligible for free or reduced meals. Notations of communication with households were not included on the face of the applications in order to clarify the denied determination.	Discussed the necessity of providing dated notes on the face of applications documenting conversations with households regarding missing data such as absence of SS #, no income provided, preference to not participate, etc. and the practice of contacting households when applications are missing any data other than the adult signature in order to qualify as many households as possible.	<i>Please provide written assurance that applications will include dated documentation notes from the determining official of conversations with the household for any circumstances that influence eligibility determination. Documentation has been provided for the specific denied applications noted in this finding.</i>
Eligibility data from previous year not kept on file in order to support 30 day grace period for eligibility based upon previous year eligibility.	Discussed 30 day grace period requirements and referred to Benefits Prior to Processing Applications section in USDA's Eligibility Manual for School Meals found on ADE's website at http://www.azed.gov/health-nutrition/files/2016/07/2016-eligibility-manual-for-school-meals.pdf .	<i>None required at this time.</i>

Performance Standard 1: Meal Counting & Claiming- Critical Area

Meal count totals by category were not correctly combined and recorded. This was deemed a non-systemic error and contributed toward fiscal action calculations. Meal count errors have resulted in fiscal action of \$9.00 for NSLP and \$14.56 for SBP.	Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue.	<i>Please provide a written description of changes to the system that have been implemented to ensure that meal service lines provide an accurate count by eligibility category each day.</i>
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Meal Access & Reimbursement: Certification & Benefit Issuance

Households eligible to receive free or reduced-price meal benefits, families that have been directly certified and households that have been denied benefits are not consistently being notified either verbally or in writing.	Discussed that even though the district is non-pricing that notifications to households regarding eligibility are required. Referred to program forms for Provision 2/3 and Notification of Eligibility Determination section in USDA's Eligibility Manual for School Meals found on ADE's website at http://www.azed.gov/health-nutrition/files/2016/07/2016-eligibility-manual-for-school-meals.pdf and Notification of Benefits Letter, School Meals found on ADE's website at http://www.azed.gov/health-nutrition/files/2016/05/ci-2.-eng-notification-of-benefits-letter-16_17.docx .	<i>Please provide a copy of the written letter or documented procedure for verbal notification of households approved for free or reduced-price meal benefits, have been directly certified or have been denied benefits. Please include a copy of letters that have been sent to specific households, as opposed to blank templates, for each of these conditions.</i>
Direct certification matches were not conducted according the proper time frames (the full enrollment at least once at or around the beginning of the school year, three months after the initial effort, and six months after the initial effort).	Referred to Direct Certification for Assistance Programs section in USDA's Eligibility Manual for School Meals. Use school calendar to plot timeframes for running reports. Also shared that direct certification reports can be run much more frequently in order to pick up any households that may be awarded other qualifying benefits between the required time frames.	<i>Please provide written assurance that direct certification will be run according to the prescribed timeframes for all students enrolled.</i>
Direct certification match lists are not being retained on file.	Discussed potential process for retention of direct certification match lists.	<i>Please provide written assurance that direct certification match lists will be retained on file as per record retention requirements.</i>
The benefit issuance document is not being updated in a timely manner to reflect changes in eligibility, new students, or withdrawn students. Some students on benefit issuance document not included on direct certification match list and some on direct certification list not on BID. Date certified on benefit issuance document not accurate for all students.	Discussed potential changes that can be made to system to ensure that updates are made in a timely manner. Clarification was also made that the 'date certified' on the benefit issuance document should be the most recent date that a change was made.	<i>Please provide a written description of how updates will be made to the benefit issuance document, including the frequency that those updates are made and how they are reflected at the point of service.</i>

The benefit issuance document (BID) does not contain all required sections. The categories for direct certification matches; SNAP, TANF, MA, Foster, FDPIR, Migrant, Homeless.

Discussed that not all direct certification matches are extended to others in the household and that the way in which the student is directly certified must be known in order to complete the Verification process. Referred to Step by Step Instruction: How to Create a Benefit Issuance Document (BID) on ADE's website found at <http://www.azed.gov/health-nutrition/files/2016/08/how-to-create-a-bid-august2016-qq.pdf>.

Please provide written assurance that the benefit issuance document will contain all required sections. Additionally, the certificate of completion for Step by Step Instruction: How to Create a Benefit Issuance Document (BID) must be submitted.

Meal Access & Reimbursement: Verification

Verification procedures were not followed correctly. The Verification Report for 2015-2016 was submitted, however no supporting documentation for the Verification process of 2015-2016 has been kept on file in order to be audited as part of this administrative review.

Discussed proper verification procedures and referred to ADE's Verification Tracking Form on ADE's website at <http://www.azed.gov/health-nutrition/files/2012/01/8.phase-3-tracking-form.pdf>. Online Training: Verification Review can be found at <http://www.azed.gov/health-nutrition/files/2016/03/verification-reviewrevised-3-21-16.pdf>. USDA's Eligibility Manual for School Meals, ADE's webpage on verification: <http://www.azed.gov/health-nutrition/nslp/verification/>

Please provide written assurance that the Verification process will be conducted according to the required procedures and that all records will be kept on file per regulation. Provide all documentation for the Verification process for PY 2016-2017 to date, including all steps, beginning October 1, 2016, including Verification Tracking Form with copies of all back-up documents and final notification to Verified household(s). Additionally, the certificate of completion for Training: Verification Review must be submitted.

Meal Access & Reimbursement: Meal Counting & Claiming

Daily edit checks are not being conducted appropriately. The Daily Edit Check report provided for the month being reviewed was written by hand, contained only partial information, and prevented the calculations built into the report to be used. The Attendance Factor was also not included.

Discussed how to complete daily edit checks using ADE's Daily Edit Check worksheet. An Active Daily Edit Check Worksheet can be found on ADE's website at <http://www.azed.gov/health-nutrition/files/2012/06/dailyeditcheckexceldec2013.xlsx>.

Please provide written assurance that daily edit checks will be conducted. The daily edit check report that was provided for October meal counts was compiled properly.

Resource Management

Responses by the SFA indicate that the Nonprofit School Food Service Account has not been maintained to regulation. No separate financial account, no year end review of total revenues and expenses. Food service is billed to 001, and no internal control procedures in place to ensure that only allowable costs are charged to the nonprofit school food service account.	Discussed feasibility for designating a separate financial account for the non-profit school food service, as well as the requirement to differentiate revenues and expenditures of the non-profit school food service if a separate account cannot be designated. More information can be found in 7 CFR 210.14. It is recommended that the requirements of 7 CFR 210.14 are immediately adhered to in order to be in compliance.	<i>None required at this time.</i>
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General Program Compliance: Civil Rights

The non-discrimination statement used on program materials is not the most current USDA statement.	Discussed where to find non-discrimination statement on ADE's website at http://www.azed.gov/health-nutrition/civil-rights/ . In order to be in compliance it is recommended that all program materials be updated with the proper language.	<i>None required at this time.</i>
Procedures for receiving and processing complaints alleging discrimination within the school meal programs are not in place to be addressed at a local level.	Discussed site-specific procedures for receiving and processing complaints, as well as identifying the outside agency to which complaints are forwarded (i.e., SA, FNSRO, FNS Office of Civil Rights, or USDA Office of Civil Rights). Additionally, the SFA's procedures must not indicate that they attempt to resolve the complaint themselves nor can the SFA's complaint process be a prerequisite for accepting a complaint. Procedures for filing a complaint can be found at https://www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer .	<i>None required at this time.</i>
Program staff have not been trained on civil rights topics.	Discussed requirement and how to document that requirement has been met. An acceptable civil rights power point training material can be found on ADE's website at http://www.azed.gov/health-nutrition/files/2012/01/az-civil-rights-compliance-for-staff-jan-20141.pdf .	<i>None required at this time.</i>

General Program Compliance: Local Wellness Policy

Observation: LWP was developed in 2015 with review due in 2017 and refers to several areas that will require some time of actual experience and gradual implementation in order to determine whether realistic adjustments will be forthcoming.

Ensure that the final version of the LWP contains all required elements and includes designation of one or more officials in charge of school compliance oversight. Review should evaluate whether the current form is being followed and whether achievable and enforceable modifications are advisable. LEAs must fully comply with the requirements of the final rule by June 30, 2017. Resources can be found at <http://teamnutrition.usda.gov>.

None required at this time.

General Program Compliance: Professional Standards

The School Nutrition Program Director hired after July 1, 2015 did not meet the hiring standard requirement.

Referred to hiring standard requirements and discussed with appropriate district HR/school staff. SFA has recently provided a request for waiver of the hiring standard requirement due to less than 100 students and remote location (although this would normally be required prior to hire).

None required at this time.

Request for waiver of the hiring standard requirement that has been submitted is currently under consideration. Further action will be contingent upon whether the waiver is granted.

The School Nutrition Program Director did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed.

Discussed 12 hour requirement and feasibility for attending upcoming applicable trainings. Trainings for School Nutrition Professionals can be found on ADE's website at <http://www.azed.gov/health-nutrition/nslp/training/>. A training plan has been provided with the expected date that the training requirement will be met as well as the name, date, and content information of trainings that the School Nutrition Program Director is registered for.

None required at this time.

At the time of the administrative review, Professional Standards training hours were not being tracked on an annual basis.

Referred to ADE's Training Tracking forms found on ADE's website at <http://www.azed.gov/health-nutrition/usda-professional-standards-new/>.

None required at this time.

General Program Compliance: Food Safety, Storage and Buy American

There is some question as to the interpretation of the school receiving two food safety inspections from the local health department each school year, or that the school requests two food safety inspections each year from the local health department.	Discussed that each site operating must obtain two food safety inspections from the local health department per school year or maintain documentation to show that two food safety inspections were requested from the local health department each school year. It is recommended that inspection scheduling occurs in separate semesters of the school year.	<i>None required at this time.</i>
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General Program Compliance: Reporting & Recordkeeping

Records documenting meal counts, eligibility data, direct certification reports and verification were not kept on file for the minimum required 5 years.	Discussed record keeping requirements and timeframe. Arizona law requires that all documents pertaining to the school meal programs be retained on file for at least 5 years. In order to be in compliance it is recommended that a plan is established to ensure this requirement is met.	<i>None required at this time.</i>
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Other Federal Program Reviews: Afterschool Snack Program

CNP Web online Site Application for 2016-2017 was approved with Afterschool Snack Program participation, however SFA program has not been active this plan year.	Technical assistance provided that the CNP Web online application are intended to reflect actual participation data and practices.	<i>Please change online Site application Section 10. After School Snack Program to reflect 'Not Participating' and resubmit both Site and Sponsor applications for approval.</i>
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Other Federal Program Reviews: Fresh Fruit & Vegetable Program

Observation: Off-Site Assessment Tool indicates that the SFA is participating in the Fresh Fruit and Vegetable Program, but there is no record of this.	Information for the FFVP can be found here: http://www.azed.gov/health-nutrition/fresh-fruit-program/	<i>None required at this time.</i>
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Comments/Recommendations:

Congratulations, Kirkland Elementary District has completed the Abbreviated Administrative Review for the Provision 2 Base year for school year 16-17. Thank you, Michelle and Karry, for all of the time and work that was required of you for this process.

To stay on track with NSLP requirements checkout the NSLP at a Glance Calendar & Monthly Checklist on our website at
http://www.azed.gov/health-nutrition/files/2016/07/sy-16_17-nslp-calendar7.20.16.pdf

Training: In-person classes, Web-based training, and How-To guides can be found on ADE's website at
<http://www.azed.gov/health-nutrition/nslp/training/>

Fiscal Action Assessed?



Yes- SBP



No- SBP



Yes- NSLP



No- NSLP

Please submit corrective action response by December 20, 2016 to Karil Hurst at karil.hurst@azed.gov or C/O ADE 1535 West Jefferson Street, Bin #7, Phoenix, AZ 85007.



11/23/16

Reviewer Signature

Date



Program Director Signature

Date

If you disagree with any finding that affects the claim for reimbursement, you may appeal the decision by following the Administrative Review Appeal Procedures found in your Child Nutrition Programs Guidance Manual.



1535 West Jefferson Street, Phoenix, Arizona 85007 • (602) 542-4361 • www.azed.gov